

Serial No. 10/660,141
Customer No. 24498

PF030065

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

Inventors: Sebastien Perrot, et al.
Application No.: 10/660,141
Confirmation No.: 4968
Filed: September 11, 2003
Title: **DEVICE FOR CONNECTING A WIRELESS
NETWORK TO AT LEAST ONE OTHER NETWORK**
Examiner: Addy, Anthony S.
Art Unit: 2617

Mail Stop **APPEAL BRIEF - PATENTS**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Sir:

The Appellants hereby submit this Appeal Brief to the Board of
Patent Appeals and Interferences on appeal from the final decision of the
Examiner rejecting Claims 2-10. Please charge the fee for this Brief to
Deposit Account No. 07-0832.

CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted on _____ to
Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, Fax No.
(571) 273-8300 on:

Date

Signature

Table of Contents

<u>Appeal Brief Section</u>	<u>Page No.</u>
Real Party in Interest	3
Related Appeals and Interferences	4
Status of Claims	5
Status of Amendments	6
Summary of Claimed Subject Matter	7
Grounds of Rejection to be Reviewed on Appeal	8
Remarks/Arguments	9
Claims Appendix	12
Evidence Appendix	14
Related Proceedings Appendix	15

Serial No. 10/660,141
Customer No. 24498

PF030065

Real Party in Interest

The real party in interest is:

THOMSON LICENSING S.A.,
46 Quai A. LeGallo
F-92100 Boulogne Billancourt
France,

the assignee of the entire right, title and interest in and to the subject
application, by virtue of an assignment recorded with the US Patent and Trademark
Office on 16 February 2004, at Reel/Frame 014340/0560.

Related Appeals and Interferences

The Appellants assert that no other appeals or interferences are known to the Appellants, the Appellants' legal representatives or assignee, which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

Status of Claims

Claim 1 has been cancelled. Claims 2-10, all of the remaining Claims in the application, have been rejected. The rejection of Claims 2-10 is appealed.

Serial No. 10/660,141
Customer No. 24498

PF030065

Status of Amendments

All submitted amendments have been entered.

Summary of Claimed Subject Matter

The following sets forth independent Claim 10, with parenthesized references to the instant specification and drawing:

10. Device for connecting a centralized wireless network (201, ¶0025) to at least one other network (207, ¶0025), said device being a wireless station compliant to the IEEE 802.11 or Hiperlan2 standards (¶0023), and further comprising:

a wireless interface (203, ¶0029) for managing more than one MAC address for association with an access point of said centralized wireless network, wherein said associations are as defined by the IEEE 802.11 or Hiperlan2 standards (¶0023);

a bridge module (301, ¶0029) for managing a plurality of ports for connecting to respective networks; and

a link management module (302, ¶0029) for managing associations of different MAC addresses corresponding to devices connected to said at least one other network with said access point of said centralized wireless network such that said devices connected to said at least one other network will appear as wireless stations to the access point (¶0027).

Grounds of Rejection to be Reviewed on Appeal

1. Whether Claims 2 and 10 are patentable under 35 USC 102(e) over US 6,400,702 to Meier.

2. Whether Claims 3-9 are patentable under 35 USC 103(a) over Meier in view of US 5,570,366 to Baker et al.

Remarks/Arguments

This invention relates to a device for connecting a centralized wireless network to another network, in which the device is compliant with IEEE 802.11 or Hiperlan 2 standards. As pointed out in ¶'s 0002 and 0007 of the instant specification, according to these standards, only one access point is allowed per wireless basic service set. It is therefore impossible to use a wireless network of this type to act as a backbone for connecting other networks. The instant invention solves this problem by providing a bridge module and a link management module, such that devices connected to another network will appear as wireless stations to the access point. Compliance with the standards is maintained.

1. Cited US 6,400,702 to Meier relates to a network which complies with IEEE 802.3. See column 3, lines 27-29. Meier uses multiple access points 107, 112, 113, 114 and 115. See column 20, lines 10-12. It is therefore clear that Meier does not comply with IEEE 802.11 or Hiperlan 2 standards.

Nowhere does Meier show or suggest:

“said device being a wireless station compliant to IEEE 802.11 or Hiperlan 2 standards”,

as specifically set forth in Claim 10. It is therefore clear that Meier does not affect the patentability of Claim 10.

Claim 2 is dependent from Claim 10, and adds further advantageous features. The Appellants submit that dependent Claim 2 is patentable as its parent Claim 10.

2. The Examiner has rejected Claims 3-9 as unpatentable over Meier in view of US 5,570,366 to Baker et al. Baker et al relates to a device for preventing transmissions to a wireless network that will not be responded to by a receiving terminal. See column 2, lines 25-29. Since Baker et al use multiple access points, as shown in Figures 3 and 4, it is clear that Baker et al does not comply with IEEE 802.11 or Hiperlan 2 standards. It is therefore clear that even if the structure of Meier were to be combined with the structure of Baker et al, the patentability of Claim 10 would not be affected. Since Claims 3-9 are dependent from Claim 10 and add further advantageous features, the Appellants submit that dependent Claims 3-9 are patentable as their parent Claim 10.

The Examiner has newly cited, but not relied upon, US 6,934,263 to Seaman and US 7,379,459 to Ohnishi. The Appellants have reviewed these newly cited references, and believe that they are no more pertinent to the claimed invention than the references upon which the Examiner has relied.

The Appellants submit that the final rejection is improper and should be reversed. A notice to that effect is respectfully solicited.

Serial No. 10/660,141
Customer No. 24498

PF030065

Respectfully submitted,
Sebastien Perrot et al.

by: __/Daniel E. Sragow/_____

Daniel E. Sragow, attorney

Reg. No. 22,856

Tel. No. (609) 734-6832

Thomson Licensing LLC
Patent Operations
2 Independence Way
Princeton, NJ 08543-5312

Date: _____

Claims Appendix

1. (cancelled)
2. Device according to claim 10, further comprising means for determining a spanning tree for all networks attached to the device, comprising means for enabling or disabling the determination of the spanning tree.
3. Device according to claim 10, further comprising means for updating filtering tables for respective connected networks, said filtering tables comprising information for determining whether a message on a network is to be forwarded to another network, said updating using a process by default, comprising means for enabling or disabling the default process.
4. Device according to claim 3, wherein said default process is based on analysis of source addresses in messages detected on a respective network, comprising means for enabling or disabling message detection based updating.
5. Device according to claim 3, further comprising means for updating a filtering table for a given network based on a device discovery process specific to said given network.
6. Device according to claim 3, wherein said default process is enabled for an Ethernet network.
7. Device according to claim 3, wherein said default process is

disabled for a USB network.

8. Device according to claim 10, further comprising means for generating a message to said link management module upon a filtering table amendment, said means for generating having an enabled state and a disabled state for each network.

9. Device according to claim 8, wherein said means for generating a message is enabled for an Ethernet network.

10. Device for connecting a centralized wireless network to at least one other network, said device being a wireless station compliant to the IEEE 802.11 or Hiperlan2 standards, and further comprising:

a wireless interface for managing more than one MAC address for association with an access point of said centralized wireless network, wherein said associations are as defined by the IEEE 802.11 or Hiperlan2 standards;

a bridge module for managing a plurality of ports for connecting to respective networks; and

a link management module for managing associations of different MAC addresses corresponding to devices connected to said at least one other network with said access point of said centralized wireless network such that said devices connected to said at least one other network will appear as wireless stations to the access point.

Serial No. 10/660,141
Customer No. 24498

PF030065

Evidence Appendix

None

Serial No. 10/660,141
Customer No. 24498

PF030065

Related Proceedings Appendix

None